

K&L GATES

May 8, 2025

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write to provide additional information requested by the Court in connection with the request for modification of Mr. Wolfson's conditions of release to permit him to speak with Demian Kudryavtsev (ECF 179, 180).

Mr. Wolfson and Mr. Kudryavtsev serve as co-CEOs of a business venture, and their conversations arise in the ordinary course of business serving in these roles. It would not be practical for the business for counsel to be present for every discussion that relates to the business, and that does not involve the matters at issue in this case.

This request is similar to that which the magistrate judge granted in Mr. Wolfson's pretrial release conditions (ECF 31), permitting Mr. Wolfson to speak with Ekaterina Faterova, the CFO of his business, about matters related to the business. Mr. Wolfson's ability to discuss business-related matters with Ms. Faterova was addressed at that hearing because she was identified by the government as a witness. Had the government identified Mr. Kudryavtsev as a witness, Mr. Wolfson would have requested a similar condition at that time permitting him to speak with Mr. Kudryavtsev about business-related matters. Now that Mr. Wolfson has identified Mr. Kudryavtsev as a possible witness in his case-in-chief, Mr. Wolfson seeks a similar provision allowing him to have business-related discussions with Mr. Kudryavtsev. No matters pertaining to this case or to Mr. Kudryavtsev's testimony will be discussed.

Respectfully submitted,

/s/ David Rybicki

David Rybicki

Counsel for Vadim Wolfson